UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ROBERT BROWN and THE ESTATE OF BOBBI)
KRISTINA BROWN)
Plaintiffs) Action No.
v.) 18-CV-11078-CM
) AFFIRMATION IN SUPPORT
SHOWTIME NETWORKS, INC.,) OF REQUEST FOR A
BRITISH BROADCASTING CORPORATION,) CLERK'S CERTIFICATE
PASSION PICTURES CORP, TRACEY BAKER-) OF DEFAUILT
SIMMONS, WANDA SHELLEY, B2)
ENTERTAINMENT LLC and SIMMONS SHELLEY)
ENTERTAINMENT, LLC)
Defendants)
)

Christopher Brown, hereby declares as follows:

- 1. I am counsel to the Plaintiffs in this action.
- 2. This action was commenced on November 26, 2018, pursuant to the Lanham Act and other claims. Tracey Baker-Simmons and Wanda Shelley were served on December 8, 2018. See Docket Entries 19 and 20.
- 3. The time for Defendants Tracey Baker-Simmons and Wanda Shelley, to answer or otherwise move with respect to the Complaint herein has expired.
- 4. Tracey Baker-Simmons and Wanda Shelley, has not answered or otherwise moved with respect to the Complaint, and the time for Defendants Tracey Baker-Simmons and Wanda Shelley to answer or otherwise move has not been extended.
- 5. That Defendants Tracey Baker-Simmons and Wanda Shelley are not infants or incompetent. Defendants Tracey Baker-Simmons and Wanda Shelley are not presently in the military service of the United States as appears from facts in this litigation.

WHEREFORE, Plaintiffs, Robert Brown and the Estate of Bobbi Kristina Brown requests that the default of Defendants Tracey Baker-Simmons and Wanda Shelley be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiffs, and that no part thereof has been paid.

ROBERT BROWN and THE ESTATE OF BOBBI KRISTINA BROWN

By Their Attorneys,

Christopher Brown

CB3465

Brown & Rosen LLC Attorneys At Law 100 State Street, Suite 900 Boston, MA 02109

617-728-9111 (T)

cbrown@brownrosen.com

Dated: January 2, 2019